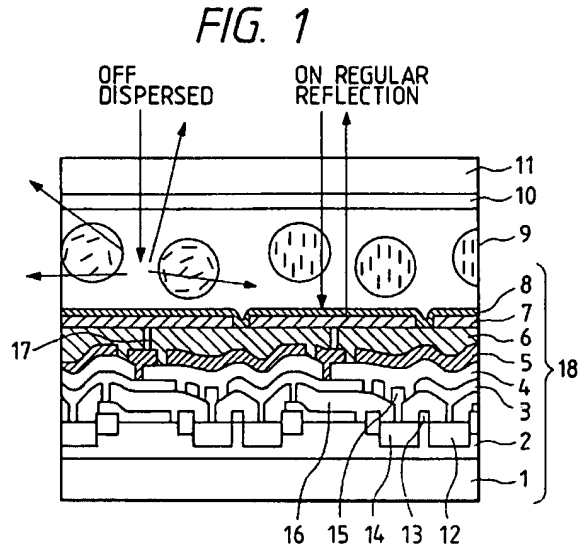


dielectric film 8, then reflecting off of reflective pixel electrodes 7 (see page 7, Paper No. 20051117).



The Official Action asserts that “[it] would have been obvious ... to implement the white light reflected on the pixel electrodes as taught by Hirota in the Komoto’s active matrix liquid crystal panel” (*Id.*). The Applicant respectfully disagrees and traverses the above assertion in the Official Action.

As noted in the *Amendment* filed March 1, 2006, the Official Action relies on a Fresnel type reflection plate 200 to allegedly teach the “counter substrate” of the claims of the present application. However, Fresnel type reflection plate 200 shown in Figure 39 of Komoto (reproduced below) would be included in the light guiding plate 26 (the lower portion of the device) shown in Figure 16 of Komoto (reproduced below). As such, in Komoto, light from light source section 20 reflects off of Fresnel type reflection plate 200 and passes through transparent substrate 32.

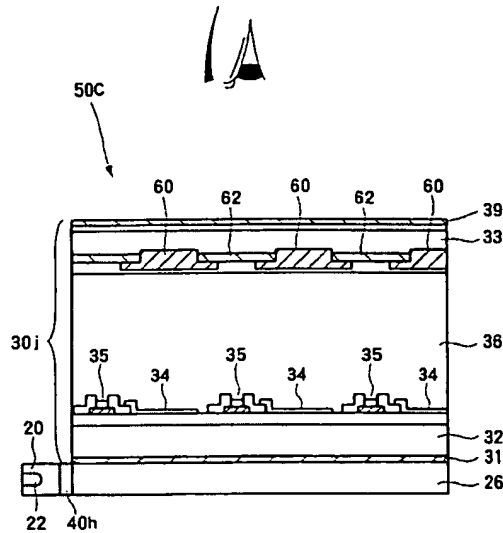


FIG. 16

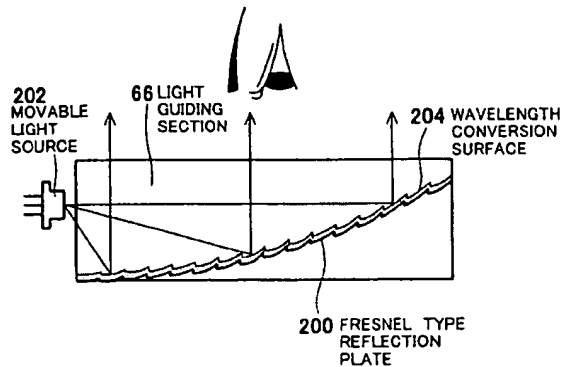


FIG. 39

As discussed in detail in the *Amendment* filed March 1, 2006, Hirota does not teach or suggest that the Fresnel type reflection plate 200 should be used in the upper portion of the device shown in Figure 16 instead of in the light guiding plate 26. Specifically, in Komoto, the light guiding plate 26 is located under the pixel electrode 34 with the substrate 32 therebetween as shown in Figure 16. As such, in order for Komoto's device to function properly, reflected light needs to pass through substrate 32. The Official Action appears to be proposing the use of reflective pixel electrodes 7 from Hirota. The Official Action does not explain how the reflective pixel electrodes 7 of Hirota would be used in Komoto. Presumably, the Official Action is proposing that pixel electrodes 34 of Komoto be replaced with reflective pixel electrodes 7 of Hirota. However, if the reflective pixel electrodes 7 of Hirota were introduced into Komoto in this manner, since light is provided from light source section 20 and reflected off of Fresnel type reflection plate 200, light could not be transmitted to the viewer. In other words, the proposed combination of Komoto and Hirota would destroy the function of Komoto. Therefore, Komoto and Hirota, either alone or in combination, do not teach or suggest that at least a part of a white light introduced to a counter substrate is reflected on a pixel electrode so as not to pass through an active matrix substrate.

Since Komoto and Hirota do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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